

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

UNITED STATES OF AMERICA

PLAINTIFF

v.

CASE NO. 4:20-CR-00288-DPM

EMILY NOWLIN

DEFENDANT

MOTION TO MODIFY PRETRIAL CONDITIONS AND REMOVE NO CONTACT ORDER
WITH CO-DEFENDANT GODDARD

Comes now the Defendant, Emily Nowlin, by and through her attorney, Adam Chiders, and for her Motion to Modify Pretrial Conditions and Remove No Contact Order, states as follows:

1. Ms. Nowlin was indicted on February 3, 2020 and was arraigned on February 25, 2021.
2. At the arraignment, Ms. Nowlin was issued a No-Contact Order for the other Co-Defendants, including Renae Goddard.
3. Ms. Nowlin and Ms. Goddard were in a relationship at the time and have wanted to continue that relationship including getting married.
4. The No-Contact order prevents such from happening.
5. Additionally, since the indictment, Ms. Nowlin has made arrangements to attempt to relocate to Chicago. Ms. Nowlin desires to relocate to Chicago as it is in her best interest for her personal and professional life.
6. It is counsel's understanding from the U.S. Pretrial Services Officer assigned to Ms. Nowlin that Ms. Nowlin has discussed this move with her, and there is no objection.
7. Ms. Nowlin requests a modification allowing her to relocate to Chicago and receive supervision services there. She has secured stable housing and continues to provide adequate contact with Defense Counsel while this case is on-going.
8. Ms. Nowlin has no prior convictions or cases currently in progress outside of this matter.
9. Counsel has spoken to the Assistant United States Attorney, and there is no objection.

WHEREFORE, the Defendant, Emily Nolwin, respectfully requests that this Court grant her Motion and remove the no contact order as well

Respectfully submitted,



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Attorney for Claimant

CERTIFICATE OF SERVICE

I, Adam Joseph Childers, do hereby certify that I have served a true and correct copy of the foregoing document to the following:

United States Attorney's Office
Assistant United States Attorney Stacy Williams
500 W. Capitol Ave.
Little Rock, AR 72201



ADAM JOSEPH CHILDERS